

1 PHILLIP A. TALBERT
United States Attorney
2 ALEXIS KLEIN
ROSS PEARSON
3 Assistant United States Attorneys
501 I Street, Suite 10-100
4 Sacramento, CA 95814
Telephone: (916) 554-2700
5 Facsimile: (916) 554-2900

6 Attorneys for Plaintiff
7 United States of America

8
9 IN THE UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12
13 Plaintiff,
14
15 v.
16 MARCUS MILLER,
REGINALD JONES,
FELICIA SHAW,
JIMMY VAN II, and
JAZZMINE CAMPBELL,
17 Defendants.

CASE NO. 2:23-cr-0150 DJC

21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to
Distribute and Possess with Intent to Distribute
Fentanyl and Methamphetamine; 21 U.S.C. §§ 846,
841(a)(1) – Attempted Possession with Intent to
Distribute Fentanyl (5 counts); 21 U.S.C. § 841(a)(1)
– Possession with Intent to Distribute Fentanyl (7
counts); 21 U.S.C. § 841(a)(1) – Possession with
Intent to Distribute Methamphetamine; 21 U.S.C. §
841(a)(1) – Possession with Intent to Distribute
Fentanyl and Methamphetamine; 18 U.S.C. §
922(g)(1) – Felon in Possession of a Firearm (2
counts); 21 U.S.C. § 853(a), 18 U.S.C. § 924(d)(1)
and 28 U.S.C. § 2461(c) – Criminal Forfeiture

19
20
21 INDICTMENT

22 COUNT ONE: [21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Distribute and Possess with Intent to
23 Distribute Fentanyl and Methamphetamine]

24 The Grand Jury charges: T H A T

25 MARCUS MILLER,
REGINALD JONES,
26 FELICIA SHAW,
JIMMY VAN II, and
27 JAZZMINE CAMPBELL,

28 defendants herein, beginning on an unknown date, but no later than on or about September 2021, and

continuing through on or about June 1, 2023, in the County of Sacramento, State and Eastern District of California, and elsewhere, did conspire and agree with each other and with persons both known and unknown to the Grand Jury to knowingly and intentionally distribute and possess with intent to distribute at least 400 grams of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, popularly known as “fentanyl,” a Schedule II controlled substance, and at least 500 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

COUNT TWO: [21 U.S.C. §§ 846, 841(a)(1) – Attempted Possession with Intent to Distribute Fentanyl]

The Grand Jury further charges: T H A T

MARCUS MILLER,
REGINALD JONES,
FELICIA SHAW,
JIMMY VAN II, and
JAZZMINE CAMPBELL,

defendants herein, on or about November 8, 2022, in the County of Sacramento, State and Eastern District of California, and elsewhere, did attempt to knowingly and intentionally possess with intent to distribute at least 400 grams of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, popularly known as “fentanyl,” a Schedule II controlled substance, in a package assigned United States Postal Service tracking number 9570 1137 2376 2312 6213 70, addressed to “Ms. Cameroon Williams 5546 Rightwood Way Sacramento, CA 95823,” in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

COUNT THREE: [21 U.S.C. §§ 846, 841(a)(1) – Attempted Possession with Intent to Distribute Fentanyl]

The Grand Jury further charges: T H A T

MARCUS MILLER,
REGINALD JONES,
FELICIA SHAW,
JIMMY VAN II, and
JAZZMINE CAMPBELL,

defendants herein, on or about November 8, 2022, in the County of Sacramento, State and Eastern

District of California, and elsewhere, did attempt to knowingly and intentionally possess with intent to distribute at least 400 grams of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, popularly known as “fentanyl,” a Schedule II controlled substance, in a package assigned United States Postal Service tracking number 9505 5136 0308 2312 9911 14, addressed to “Ms. Devaughn Carter 5924 63rd Street Sacramento, CA 95824,” in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

COUNT FOUR: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Fentanyl]

The Grand Jury further charges: T H A T

MARCUS MILLER,
REGINALD JONES,
FELICIA SHAW,
JIMMY VAN II, and
JAZZMINE CAMPBELL,

defendants herein, on or about October 26, 2022, in the County of Sacramento, State and Eastern District of California, did knowingly and intentionally possess with intent to distribute at least 400 grams of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, popularly known as “fentanyl,” a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIVE: [21 U.S.C. §§ 846, 841(a)(1) – Attempted Possession with Intent to Distribute Fentanyl]

The Grand Jury further charges: T H A T

MARCUS MILLER,
REGINALD JONES,
FELICIA SHAW,
JIMMY VAN II, and
JAZZMINE CAMPBELL,

defendants herein, on or about December 21, 2022, in the County of Yolo, State and Eastern District of California, and elsewhere, did attempt to knowingly and intentionally possess with intent to distribute at least 400 grams of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, popularly known as “fentanyl,” a Schedule II controlled substance, in a package assigned United States Postal Service tracking number 9505 5123 7586 2355 8660 81 addressed to “R. Higgins 857 Silicon Ct West Sacramento, CA 95691,” in violation of Title 21,

1 United States Code, Sections 846 and 841(a)(1).

2 COUNT SIX: [21 U.S.C. §§ 846, 841(a)(1) – Attempted Possession with Intent to Distribute Fentanyl]

3 The Grand Jury further charges: T H A T

4 MARCUS MILLER,
5 REGINALD JONES,
6 FELICIA SHAW,
JIMMY VAN II, and
JAZZMINE CAMPBELL,

7 defendants herein, on or about December 21, 2022, in the County of Sacramento, State and Eastern
8 District of California, and elsewhere, did attempt to knowingly and intentionally possess with intent to
9 distribute at least 400 grams of a mixture and substance containing a detectable amount of N-phenyl-N-
10 [1-(2-phenylethyl)-4-piperidinyl] propanamide, popularly known as “fentanyl,” a Schedule II controlled
11 substance, in a package assigned United States Postal Service tracking number 9505 5107 2626 2355
12 4733 44 addressed to “James Van 5924 63rd St Sacramento, CA 95824,” in violation of Title 21,
13 United States Code, Sections 846 and 841(a)(1).

14 COUNT SEVEN: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Fentanyl]

15 The Grand Jury further charges: T H A T

16 MARCUS MILLER,
17 REGINALD JONES,
18 FELICIA SHAW,
JIMMY VAN II, and
JAZZMINE CAMPBELL,

19 defendants herein, on or about January 5, 2023, in the County of Sacramento, State and Eastern District
20 of California, did knowingly and intentionally possess with intent to distribute at least 40 grams of a
21 mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]
22 propanamide, popularly known as “fentanyl,” a Schedule II controlled substance, in violation of Title
23 21, United States Code, Section 841(a)(1).

24 ///

25 ///

26 ///

1 COUNT EIGHT: [21 U.S.C. §§ 846, 841(a)(1) – Attempted Possession with Intent to Distribute
2 Fentanyl]

3 The Grand Jury further charges: T H A T

4 MARCUS MILLER,
5 REGINALD JONES,
6 FELICIA SHAW,
JIMMY VAN II, and
JAZZMINE CAMPBELL,

7 defendants herein, on or about January 24, 2023, in the County of Sacramento, State and Eastern District
8 of California, and elsewhere, did attempt to knowingly and intentionally possess with intent to distribute
9 at least 400 grams of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-
10 phenylethyl)-4-piperidiny] propanamide, popularly known as “fentanyl,” a Schedule II controlled
11 substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

12 COUNT NINE: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Methamphetamine]

13 The Grand Jury further charges: T H A T

14 MARCUS MILLER,
15 REGINALD JONES,
16 FELICIA SHAW,
JIMMY VAN II, and
JAZZMINE CAMPBELL,

17 defendants herein, on or about February 7, 2023, in the County of Sacramento, State and Eastern District
18 of California, did knowingly and intentionally possess with intent to distribute at least 50 grams of a
19 mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled
20 substance, in violation of Title 21, United States Code, Section 841(a)(1).

21 COUNT TEN: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Fentanyl]

22 The Grand Jury further charges: T H A T

23 MARCUS MILLER,
24 REGINALD JONES,
25 FELICIA SHAW,
JIMMY VAN II, and
JAZZMINE CAMPBELL,

26 defendants herein, on or about March 21, 2023, in the County of Sacramento, State and Eastern District
27 of California, did knowingly and intentionally possess with intent to distribute at least 400 grams of a
28

1 mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny]

2 propanamide, popularly known as “fentanyl,” a Schedule II controlled substance, in violation of Title

3 21, United States Code, Section 841(a)(1).

4 COUNT ELEVEN: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Fentanyl]

5 The Grand Jury further charges: T H A T

6 MARCUS MILLER,
7 REGINALD JONES,
8 FELICIA SHAW,
JIMMY VAN II, and
JAZZMINE CAMPBELL,

9 defendants herein, on or about May 19, 2023, in the County of Sacramento, State and Eastern District of

10 California, did knowingly and intentionally possess with intent to distribute at least 40 grams of a

11 mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny]

12 propanamide, popularly known as “fentanyl,” a Schedule II controlled substance, in violation of Title

13 21, United States Code, Section 841(a)(1).

14 COUNT TWELVE: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Fentanyl]

15 The Grand Jury further charges: T H A T

16 MARCUS MILLER,
17 REGINALD JONES,
18 FELICIA SHAW,
JIMMY VAN II, and
JAZZMINE CAMPBELL,

19 defendants herein, on or about June 1, 2023, in the County of Sacramento, State and Eastern District of

20 California, did knowingly and intentionally possess with intent to distribute at least 400 grams of a

21 mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny]

22 propanamide, popularly known as “fentanyl,” a Schedule II controlled substance, specifically located

23 inside 5924 63rd Street Sacramento, CA 95824, in violation of Title 21, United States Code, Section

24 841(a)(1).

25 ///

26 ///

27 ///

1 COUNT THIRTEEN: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Fentanyl]

2 The Grand Jury further charges: T H A T

3 MARCUS MILLER,
4 REGINALD JONES,
5 FELICIA SHAW,
JIMMY VAN II, and
JAZZMINE CAMPBELL,

6 defendants herein, on or about June 1, 2023, in the County of Yolo, State and Eastern District of
7 California, did knowingly and intentionally possess with intent to distribute at least 400 grams of a
8 mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]
9 propanamide, popularly known as “fentanyl,” a Schedule II controlled substance, specifically located
10 inside a storage unit designated as Cube L48, located at CubeSmart, 541 Harbor Blvd, West
11 Sacramento, CA 95691, in violation of Title 21, United States Code, Section 841(a)(1).

12 COUNT FOURTEEN: [21 U.S.C. §§ 846, 841(a)(1) – Possession with Intent to Distribute Fentanyl and
13 Methamphetamine]

14 The Grand Jury further charges: T H A T

15 MARCUS MILLER,
16 REGINALD JONES,
17 FELICIA SHAW,
JIMMY VAN II, and
JAZZMINE CAMPBELL,

18 defendants herein, on or about June 1, 2023, in the County of Sacramento, State and Eastern District of
19 California, did knowingly and intentionally possess with intent to distribute a mixture and substance
20 containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide,
21 popularly known as “fentanyl,” a Schedule II controlled substance, and at least 50 grams of a mixture or
22 substance containing a detectable amount of methamphetamine, a Schedule II controlled substance,
23 specifically located inside a 2018 Mercedes Benz S560 sedan bearing California license plate 9DGJ189,
24 in violation of Title 21, United States Code, Section 841(a)(1).

25 ///

26 ///

27 ///

1 COUNT FIFTEEN: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Fentanyl]

2 The Grand Jury further charges: T H A T

3 MARCUS MILLER,
4 REGINALD JONES,
5 FELICIA SHAW,
JIMMY VAN II, and
JAZZMINE CAMPBELL,

6 defendants herein, on or about June 1, 2023, in the County of Sacramento, State and Eastern District of
7 California, did knowingly and intentionally possess with intent to distribute at least 400 grams of a
8 mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]
9 propanamide, popularly known as “fentanyl,” a Schedule II controlled substance, specifically located
10 inside a gray 2021 Jeep SUV bearing California license plate 9DEK577, in violation of Title 21, United
11 States Code, Section 841(a)(1).

12 COUNT SIXTEEN: [18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm]

13 The Grand Jury further charges: T H A T

14 MARCUS MILLER,

15 defendant herein, on or about June 1, 2023, in the County of Sacramento, State and Eastern District of
16 California, knowing that he had been convicted of a crime punishable by a term of imprisonment
17 exceeding one year, that is:

- 18
- 19 • Felon in possession of a firearm, in violation of California Penal Code section 29800(a)(1), on or about February 7, 2017, in Sacramento County, California; and
 - 20 • Burglary, in violation of California Penal Code section 459, on or about January 13, 2012, in Placer County, California;
- 21

22 did knowingly possess a firearm, specifically, a Glock, model 26, 9mm caliber pistol, with serial number
23 AEDF619, in and affecting commerce, in that said firearm had previously been transported in interstate
24 and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

25 COUNT SEVENTEEN: [18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm]

26 The Grand Jury further charges: T H A T

27 REGINALD JONES,

28 defendant herein, on or about June 1, 2023, in the County of Sacramento, State and Eastern District of

California, knowing that he had been convicted of a crime punishable by a term of imprisonment exceeding one year, that is:

- Felon in possession of a firearm, in violation of California Penal Code section 29800(a)(1), on or about June 23, 2020, in Sacramento County, California;
- Carrying a loaded firearm in public, in violation of California Penal Code section 25850(a) (2 counts), and evading a peace officer by willful and wanton disregard for safety of persons or property, in violation of California Vehicle Code section 2800.2(a), on or about March 1, 2012, in Sacramento County, California;
- Felon in possession of a firearm, in violation of Penal Code section 12021(a)(1), on or about June 11, 2009, in Sacramento County, California; and
- Carrying a loaded, concealed weapon on a person, in violation of Penal Code section 12025(b), on or about February 17, 2008, in Sacramento County, California;

did knowingly possess a firearm, specifically, a Glock, model 32, .357 caliber pistol, with serial number MEN520, in and affecting commerce, in that said firearm had previously been transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION: [21 U.S.C. § 853(a), 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c) – Criminal Forfeiture]

1. Upon conviction of one or more of the offenses alleged in Counts One through Fifteen of this Indictment, defendants MARCUS MILLER, REGINALD JONES, FELICIA SHAW, JIMMY VAN II, AND JAZZMINE CAMPBELL shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a), the following property:

a. Any real or personal property, which constitutes or is derived from proceeds obtained, directly or indirectly, as a result of such offenses; and any property used, or intended to be used, in any manner or part to commit or to facilitate the commission of the offenses.

b. A sum of money equal to the total amount of proceeds obtained as a result of the offenses, for which defendants are convicted.

2. Upon conviction of one or more of the offenses alleged in Counts Sixteen and Seventeen of this Indictment, defendants MARCUS MILLER AND REGINALD JONES shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in or used in the knowing commission of the offenses.

3. If any property subject to forfeiture, as a result of the offenses alleged in Counts One through Seventeen of this Indictment, for which defendants are convicted:

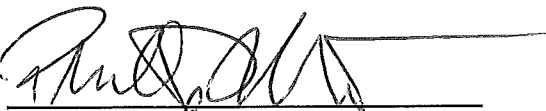
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of defendants, up to the value of the property subject to forfeiture.

A TRUE BILL.

/s/ Signature on file w/AUSA

FOREPERSON



PHILLIP A. TALBERT
United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

NO PROCESS NECESSARY

MARCUS MILLER,
REGINALD JONES,
FELICIA SHAW,
JIMMY VAN II, and
JAZZMINE CAMPBELL

I N D I C T M E N T

VIOLATION(S):

21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Distribute and Possess with Intent to Distribute Fentanyl and Methamphetamine;
21 U.S.C. §§ 846, 841(a)(1) – Attempted Possession with Intent to Distribute Fentanyl (5 counts);
21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Fentanyl (7 counts);
21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Methamphetamine;
21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Fentanyl and Methamphetamine;
18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm (2 counts); and
21 U.S.C. § 853(a), 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c) – Criminal Forfeiture

A true bill,

/s/ Signature on file w/AUSA

Foreman.

Filed in open court this _____ 15th day

of _____ June _____, A.D. 20 23

/s/ L. Kennison

Clerk.

NO PROCESS NECESSARY

Carol H. Delaney

United States v. Marcus MILLER, et al.
Penalties for Indictment

Defendants

Marcus MILLER
Reginald JONES
Felicia SHAW
Jimmy VAN II
Jazzmine CAMPBELL

COUNT 1: **ALL DEFENDANTS**

VIOLATION: 21 U.S.C. §§ 846, 841(a)(1) - Conspiracy to Distribute and Possess with Intent to Distribute at least 400 grams of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, popularly known as “fentanyl,” a Schedule II controlled substance and at least 500 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1);

PENALTIES: Mandatory minimum of 10 years in prison and up to life in prison; or Fine of up to \$10,000,000; or both fine and imprisonment
Supervised release of at least 5 years and up to life

SPECIAL ASSESSMENT: \$100 (mandatory)

COUNTS 2, 3, 5, 6, 8: **ALL DEFENDANTS**

VIOLATION: 21 U.S.C. §§ 846 and 841(a)(1) - Attempted Possession with Intent to Distribute Fentanyl (over 400 grams)

PENALTIES: Mandatory minimum of 10 years in prison and up to life in prison; or Fine of up to \$10,000,000; or both fine and imprisonment
Supervised release of at least 5 years and up to life

SPECIAL ASSESSMENT: \$100 (mandatory)

COUNTS 4, 10, 12, 13, 15: **ALL DEFENDANTS**

VIOLATION: 21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute Fentanyl (over 400 grams)

PENALTIES: Mandatory minimum of 10 years in prison and up to life in prison; or
Fine of up to \$10,000,000; or both fine and imprisonment
Supervised release of at least 5 years and up to life

SPECIAL ASSESSMENT: \$100 (mandatory)

COUNTS 7, 11: **ALL DEFENDANTS**

VIOLATION: 21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute Fentanyl (at least 40 grams)

PENALTIES: Mandatory minimum of 5 years in prison and up to 40 years in prison; or
Fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years and up to life

SPECIAL ASSESSMENT: \$100 (mandatory)

COUNT 8: **ALL DEFENDANTS**

VIOLATION: 21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute
Methamphetamine (at least 50 grams)

PENALTIES: Mandatory minimum of 5 years in prison and up to 40 years in prison; or
Fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years and up to life

SPECIAL ASSESSMENT: \$100 (mandatory)

COUNT 14: **ALL DEFENDANTS**

VIOLATION: 21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute Fentanyl and
Methamphetamine (at least 50 grams of methamphetamine)

PENALTIES: Mandatory minimum of 5 years in prison and up to 40 years in prison; or
Fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years and up to life

SPECIAL ASSESSMENT: \$100 (mandatory)

COUNT 16: **MARCUS MILLER**

VIOLATION: 18 U.S.C. § 922(g)(1) - Felon in possession of firearm

PENALTIES: Maximum of 15 years in prison,
Fine of up to \$250,000; or both fine and imprisonment
Up to a three-year term of supervised release

SPECIAL ASSESSMENT: \$100 (mandatory)

COUNT 17: **REGINALD JONES**

VIOLATION: 18 U.S.C. § 922(g)(1) - Felon in possession of firearm

PENALTIES: Maximum of 15 years in prison,
Fine of up to \$250,000; or both fine and imprisonment
Up to a three-year term of supervised release

SPECIAL ASSESSMENT: \$100 (mandatory)

FORFEITURE ALLEGATION: **ALL DEFENDANTS**

VIOLATION: 21 U.S.C. § 853(a) - Criminal Forfeiture

18 U.S.C. § 924(d)(1), 28 U.S.C. § 2461(c) - Criminal Forfeiture

PENALTIES: As stated in the charging document